

continuously thereafter up to and including June 21, 2006, in the Central Division of the District of Utah,

MICHAEL LEE JOHNSON,

the Defendant herein, did knowingly conduct, finance, manage, supervise, direct and own all or part of an illegal gambling business as defined in 18 U.S.C. § 1955(b)(1), to wit, a poker room, and did aid, abet, command, counsel, induce, and procure therein, all in violation of 18 U.S.C. § 1955(a) and 18 U.S.C. § 2.

COUNT 2
(18 U.S.C. § 1957)
(Money Laundering)

On or about January 18, 2005, in the Central Division of the District of Utah,

MICHAEL LEE JOHNSON,

the Defendant herein, did knowingly engage and attempt to engage in a monetary transaction in criminally derived property of a value greater than \$10,000, to wit, the purchase of an official check from Washington Mutual Bank in the amount of \$25,000, and such property having been derived from a specified unlawful activity, that is, the operation of an illegal gambling business in violation of 18

U.S.C. § 1955 as alleged in Count 1 of this indictment and which Count is incorporated herein by reference; all in violation of 18 U.S.C. § 1957.

COUNT 3
(18 U.S.C. § 1957)
(Money Laundering)

On or about January 19, 2005, in the Central Division of the District of Utah,

MICHAEL LEE JOHNSON,

the Defendant herein, did knowingly engage and attempt to engage in a monetary transaction in criminally derived property of a value greater than \$10,000, that is the deposit of \$25,000 into a brokerage account at Fidelity Investments, such property having been derived from a specified unlawful activity, that is, the operation of an illegal gambling business in violation of 18 U.S.C. § 1955 as alleged in Count 1 of this indictment and which Count is incorporated herein by reference; all in violation of 18 U.S.C. § 1957.

COUNT 4
(18 U.S.C. § 1957)
(Money Laundering)

On or about June 26, 2005, in the Central Division of the District of Utah
and elsewhere,

MICHAEL LEE JOHNSON,

the Defendant herein, did knowingly engage and attempt to engage in a monetary transaction in criminally derived property of a value greater than \$10,000, that he deposited \$20,000 in United States currency into an account at Gold Coast Hotel and Casino in Las Vegas, Nevada, such property having been derived from a specified unlawful activity, that is the operation in the State and District of Utah of an illegal gambling business in violation of 18 U.S.C. § 1955 as alleged in Count 1 of this indictment and which Count is incorporated herein by reference, and the defendant having participated in the transfer of such property from the District of Utah to Las Vegas in the District of Nevada; all in violation of 18 U.S.C. § 1957.

COUNT 5
(18 U.S.C. § 1957)
(Money Laundering)

On or about July 3, 2005, in the Central Division of the District of Utah and elsewhere,

MICHAEL LEE JOHNSON,

the Defendant herein, did knowingly engage and attempt to engage in a monetary transaction in criminally derived property of a value greater than \$10,000, that he withdrew \$20,000 in United States currency from an account at Gold Coast Hotel and Casino in Las Vegas Nevada, such property having been derived from a specified unlawful activity, that is the operation in the State and District of Utah of an illegal gambling business in violation of 18U.S.C. § 1955 as alleged in Count 1 of this indictment and which Count is incorporated herein by reference, and the defendant having participated in the transfer of such property from the District of Utah to Las Vegas in the District of Nevada; all in violation of 18 U.S.C. § 1957.

NOTICE OF INTENT TO SEEK FORFEITURE

As a result of committing the felony offenses alleged in Counts 1 through 5 of this indictment, which are punishable by imprisonment for more than one year,

the defendant shall forfeit to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(C), 982(a)(2)(A), (B), and (a)(6), and 28 U.S.C. § 2461 any and all property, real and personal, constituting proceeds deriving from violations of 18 U.S.C. §§ 1955 and 1957, or used or intended to be used in any manner or part to commit and to facilitate the commission of a violation of such statutes, and any property traceable thereto, including but not limited to the following:

PROCEEDS (MONEY JUDGMENT)

The aggregate sum of four-hundred-thousand dollars (\$400,000.00), representing the value of the United States currency obtained by the defendant in connection with the above-referenced offenses.

SUBSTITUTE ASSETS


If any of the above-described forfeitable property, as a result of any act or omission of the defendant,

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be

divided without difficulty;

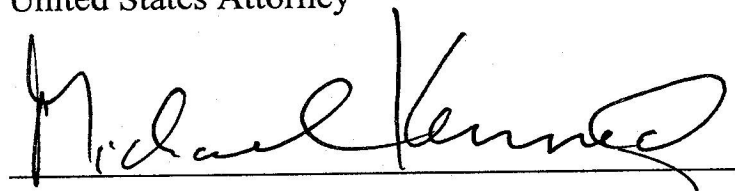
it is the intent of the United States, pursuant to 28 U.S.C. § 2461(c) and 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above-forfeitable property.

A TRUE BILL:



FOREPERSON OF THE GRAND JURY

BRETT L. TOLMAN
United States Attorney



MICHAEL P. KENNEDY
Assistant United States Attorney